8.0 SITE CLEANUP ACTION

8.1 Selected Cleanup Action

The cleanup action selected is Alternative 4 which is the alternative that is permanent to the maximum extent practicable Alternative 4 consists of the following major elements:

- Building demolition;
- Limited soil sampling;
- Removal of the underground storage tank, dry wells DW1 and DW2, and drain lines;
- Incineration of liquid PCB and sediments;
- Excavation of surface soil above 10 mg/Kg PCB in the City Parcel property and in the alleyway;
- Excavation of soil above 10 mg/kg PCBs associated with the removal of the dry wells and the underground storage tank;
- Off-site disposal of soil in a TSCA-permitted landfill;
- Backfilling with clean soil;
- Deed restriction for the following properties;
  - City Parcel and City of Spokane properties limiting the site to industrial use.
  - Alleyway to protect integrity of the soil cover

8.2 Evaluation of the Cleanup Action with Respect to MTCA Criteria

8.2.1 Threshold Requirements

Protect human health and the environment

All PCB contaminated soils with concentrations greater than 10 mg/kg (the PCB industrial cleanup level) will be excavated The excavated soils will be disposed off-site in a TSCA-permitted landfill. This will provide a high level of protection of human health and the environment. Remedial action objectives will be met with a high degree.

Comply with cleanup standards

The PCBs cleanup level will be attained at the point of compliance in the City Parcel and City of Spokane property which are industrial properties The PCBs cleanup level of 1 mg/kg will not be met at the point of compliance in the alleyway; cleanup standards will be complied with under the requirements of WAC 173-340-740(6)(f).

Comply with applicable state and federal law

Off-site disposal of PCB contaminated soils in a permitted landfill, and incineration of any liquid PCB and sludges would meet the TSCA action ARARs Other ARARs that are listed in Table 6 could be complied with.

Provide for compliance monitoring

Protection monitoring, to confirm that human health and the environment are adequately protected, would be conducted during building demolition, excavation and loading to confirm that human health and the environment are adequately protected. Important elements including dust suppression, storm runoff, and access restrictions during the cleanup will be described in the safety and health plan.

Confirmation soil sampling would be conducted to verify that soil cleanup levels are met. One round of ground water sampling and analysis for PCBs will be performed to ensure that there continues to be no PCB impact to ground water.

8.2.2 Other Requirements

Use permanent solutions to the maximum extent practicable

(i) Protectiveness: This alternative will provide a very high degree of protection of human health and the environment.
(ii) Permanence: This alternative will be a permanent remedy.
(iii) Cost: The capital cost, and operation and maintenance costs are given in Table 8. The total present value of Alternative 4 will be $649,465.
(iv) Effectiveness over the long-term. Off-site disposal in an engineered, lined and monitored facility is third in the descending order in the assessment of the relative degree of long-term effectiveness under WAC 173-340-360(3)(e)(iv).
(v) Management of short-term risks. All short-term risks will be easily controlled during the removal activities. Risks during excavation, loading, and transportation of PCB-contaminated soils will be controlled. During the excavation and loading activities, dusts suppression methods will be implemented to prevent the potential impact to the surrounding community. Air monitoring will be conducted to ensure that fugitive dusts will not pose a threat. Risks incurred by offsite transport due to potential for spills of accidental loss of materials will be mitigated.
(vi) Technical and administrative implementability: Excavation, hauling, and backfilling operations of soils is easily implemented. Off-site disposal will occur at an existing permitted off-site facility.
(vii) Consider public concerns: The public will have an opportunity to comment on this selected cleanup action.

Provide for reasonable restoration time frame

The PCBs cleanup level at the Site would be immediately complied with at the point of compliance after excavation and backfilling with clean soils for all industrial properties.

Consider public concerns

The public review and comment period for the draft Cleanup Action Plan was conducted from July 21 through August 19, 2004. No written comments were received during this period.

8.2.3 Expectations for Cleanup Action Alternatives

Alternative 4 will meet Ecology's expectation that for sites containing small volumes of hazardous substances, all hazardous substances will be destroyed, detoxified, and/or removed to concentrations below cleanup levels in order to minimize the need for long-term management of contaminated materials.

8.3 Implementation Schedule

The implementation schedule for the Cleanup Action Plan has not been determined at this time.